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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT PERROT,

Defendant.

Case No. 2:24-cr-00064-RFB-EJY

**Robert Perrot's Motion to Appoint Co-
Counsel & Proposed Order**

Defendant Robert Perrot respectfully asks this Honorable Court to appoint Adrian Lobo, Esq., as co-counsel in this matter *nunc pro tunc*.¹ The nature and complexity of this case, as well as the impending trial date, are such that the interests of justice require the appointment of co-counsel. Ms. Lobo is an experienced trial attorney and well suited to serve in that role. Consistent with Nevada's CJA Plan and General Order 2021-01, defense counsel has obtained the required approval of the CJA Standing Committee and CJA Resource Counsel. Accordingly, counsel submits the instant motion.

This motion is made and based upon the Guide to Judicial Policies and Procedures, Vol. 7, Ch. 2 § 230.53.20(b), the attached memorandum of points and authorities, the pleadings and

¹ Defense counsel respectfully requests April 9, 2025 be the *nunc pro tunc* date, which is the date the request for co-counsel was sent to the CJA unit for approval.

papers on file herein, and any argument entertained by the Court.

MEMORANDUM OF POINTS AND AUTHORITIES

A. BACKGROUND

Defendant Robert Perrot is one of ten charged defendants in this case. The Government's Indictment charges Mr. Perrot with one count of Conspiracy to Distribute a Controlled Substance (21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(A)(viii), (b)(1)(A)(vi), and (b)(1)(B)(ii)), two counts of Distribution of a Controlled Substance-Methamphetamine (21 U.S.C. §§841(a)(1), 841(b)(1)(A)(viii)), one count of Distribution of a Controlled Substance-Cocaine (21 U.S.C. §§841(a)(1), 841(b)(1)(b)(ii) and 18 U.S.C. §2), and one count of Conspiracy to Launder Money (18 U.S.C. §1956(h)). This wide-ranging conspiracy spans a time-period of five years. This case will go to trial on June 2, 2025, and is expected to last several weeks. Presumably, the Government will be represented at trial by two attorneys as well as support staff. Mr. Perrot should likewise have the benefit at trial of two defense attorneys given the nature and complexity of this case, as well as the impending trial date.

B. APPOINTMENT OF CO-COUNSEL

This case warrants the appointment of co-counsel because it is complex and difficult. *See* Guide to Judiciary Policies and Procedures, Vol. 7, Ch. 2 § 230.53.20(b). The discovery produced to date is voluminous and includes more than 175,000 audio files and over 2,000 pages of written discovery. Finally, the case is currently set for trial in less than two months. Preparing a meaningful defense in such a case requires the appointment of co-counsel.

At the State level, the undersigned counsel has previously worked with Ms. Lobo on numerous cases, including serious murder and sexual assault cases, so her quality of work is well respected. Ms. Lobo has practiced criminal law in both state and federal court for the past 19 years. In State court, she has tried over 20 jury trials, which have included homicide and sexual assault cases. From 2017- 2021, Ms. Lobo was a CJA Panel attorney and represented clients charged with

1 drug offenses, gun offenses, and embezzlement/theft offenses.

2 Nevada's CJA Plan & General Order 2021-01 vest the CJA Standing Committee (the
3 "Committee") with authority to determine whether a case is "extremely difficult" such that the
4 appointment of co-counsel is in the "interest of justice." The undersigned counsel submitted a
5 request for co-counsel using the District of Nevada's eVoucher program. The Committee Chair has
6 approved the request for co-counsel. Additionally, the defense obtained the recommendation of
7 CJA Resource Counsel.

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9 Having satisfied the necessary procedural requirements, and to comply with Guide to
10 Judiciary Policy § 230.53.20, the defense seeks an order appointing Ms. Lobo as co-counsel for
11 Mr. Perrot.

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13 DATED: April 18, 2025.

14 Respectfully submitted,

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16 By: /s/ Abel Yanez

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25 *Attorney for Defendant, Robert Perrot*
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Certificate of Electronic Service

The undersigned hereby certifies that she is an employee of the Nobles & Yanez Law Firm and is a person of such age and discretion as to be competent to serve papers. That on April 18, 2025, she served an electronic copy of this **Robert Perrot's Motion to Appoint Co-Counsel & Proposed Order** by electronic service (ECF) to the person named below:

SUE FAHAMI
United States Attorney
STEVEN ROSE
Assistant United States Attorney
501 Las Vegas Blvd. South
Suite 1100
Las Vegas, NV 89101

/s/ Clarissa McGill

Employee of the Nobles & Yanez
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ORDER APPOINTING CO-COUNSEL

Counsel for Defendant, Robert Perrot, has moved for an order appointing co-counsel in this case. The motion seeking appointment of co-counsel explains the nature of the case, the difficulties it presents, and how, as a result, appointing co-counsel is necessary in the interest of justice.

Proposed co-counsel, Adrian Lobo, Esq., is consistent with Nevada's CJA Plan and General Order 2021-01, and defense counsel has obtained the required approval for this appointment from the CJA Standing Committee and CJA Resource Counsel.

As required by Vol. 7, Ch. 2 § 230.53.20(b) of the Guide to Judicial Policies and Procedures, the Court finds that the appointment of an additional attorney in this case is necessary and in the interests of justice.

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1 GOOD CAUSE APPEARING, it is hereby **ORDERED** that the Clerk of the Court shall
2 notify the CJA appointing authority for the District of Nevada of the appointment of attorney
3 Adrian Lobo as co-counsel for Defendant, Robert Perrot.

4 **IT IS FURTHER ORDERED** that this Order be made effective *nunc pro tunc* to April 9,
5 2025, the date the request for approval of co-counsel was submitted to the CJA Resource Counsel.

6 **IT IS SO ORDERED.**

7 DATED this 22nd day of April, 2025.
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11 **RICHARD F. BOULWARE, II**
12 **UNITED STATES DISTRICT JUDGE**
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